



June 14, 2019

VIA HAND DELIVERY

Accepted / Filed

JUN 14 2019

Federal Communications Commission
Office of the Secretary

DOCKET FILE COPY ORIGINAL

Marlene H. Dortch, Esq.
Secretary
445 Twelfth Street, S.W.
Washington, DC 20554

RE: REQUEST FOR CONFIDENTIAL TREATMENT OF INFORMATION
MezmoCorp (dba InnoCaption)
CG Docket Nos. 03-123 and 13-24

Dear Ms. Dortch:

MezmoCorp (dba InnoCaption), requests highly confidential treatment of certain information contained in the enclosed *Emergency Petition for Interim Waiver* ("Waiver Request"). The redacted and non-redacted version has been filed today in CG Docket Nos. 03-123 and 13-24 by hand delivery. Pursuant to Exemption 4 of the Freedom of Information Act and the Rules of the Federal Communications Commission, InnoCaption requests confidential treatment for the information which has been labeled confidential in the attached Waiver Request and redacted in the public version of the Waiver Request.¹

1. *Identification of the specific information for which confidential treatment is sought.*
InnoCaption requests highly confidential treatment of InnoCaption internal usage data, financial impact information, internal staffing requirements, and investment needs. This information is both financial in nature and confidential. Accordingly, this information would not routinely be made available to the public.
2. *Identification of the Commission proceeding in which the information was submitted or a description of the circumstance giving rise to the submission.* InnoCaption is submitting this Waiver Request for inclusion in the Commission's docketed proceeding regarding Telecommunications Relay Services, CG Docket Nos. 03-123 and 13-24.

¹ 5 U.S.C. § 552(b)(4); 47 C.F.R. §§ 0.457(d) and 0.459; see also 18 U.S.C. § 1905

No. of Copies rec'd 0
List ABCDE

3. *Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.*
The information for which InnoCaption is requesting confidential treatment includes internal and financial information which is company-specific, competitively-sensitive, and confidential. The information provided can be used by competitors and potential competitors to the detriment of InnoCaption. This information is not customarily made available to the public and is protected by the Company.
4. *Explanation of the degree to which the information concerns a service that is subject to competition.* The confidential internal and financial information disclosed in this filing relates to InnoCaption customer usage, internal financial information and the reimbursement rates for the provision of Internet Protocol Caption Telephone Service (IP-CTS). Disclosure of the confidential information will likely cause irreparable harm to InnoCaption by providing competitors information which may be used to their competitive advantage.
5. *Explanation of how disclosure of the information could result in substantial competitive harm.* This information is financial and confidential in nature and would not be subject to public inspection. The Commission's rules recognize that release of this kind of internal and financial information is likely to produce competitive harm.
6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.* InnoCaption takes precautions to ensure confidential information such as the internal data and financial information included in this document is not released to the public or obtained by competitors and potential competitors through other means.
7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.* The confidential internal and financial information is not available to the public. Additionally, the information has not otherwise been disclosed previously to the public.
8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.* InnoCaption requests confidential treatment of the redacted information indefinitely, as it is not currently possible to determine a specific date by which the information could be disclosed without risk of harm.
9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.* The information provided by InnoCaption is internal data and financial in nature, obtained from a person outside of the government, and confidential. Therefore, the financial and confidential information in question is protected by Exemption 4 of FOIA.²

² 5 U.S.C. § 552(b)(4)

Please do not hesitate to contact the undersigned with any questions you may have.

Respectfully Submitted,

Cristina O. Duarte
Director of Regulatory Affairs
MezmoCorp (dba InnoCaption)
14111 Robert Paris Court
Chantilly, VA 20151
(571) 210-7687
cristinaduarte@innocaption.com

CC via Email

Arielle Roth
Eliot Greenwald
David Schmidt
Jamie Susskind
Michael Carowitz
Michael Scott
Travis Litman
Randy Clarke
Robert Aldrich

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals)	
with Hearing and Speech Disabilities)	
)	
Misuse of Internet Protocol (IP) Captioned)	CG Docket No. 13-24
Telephone Service)	
)	

EMERGENCY PETITION FOR INTERIM WAIVER

Cristina O. Duarte
Director of Regulatory Affairs
MezmoCorp (dba InnoCaption)
14111 Robert Paris Court
Chantilly, VA 20151
(571) 210-7687
cristinaduarte@innocaption.com

June 14, 2019

TABLE OF CONTENTS

I. BACKGROUND.....	1
II. SUMMARY.....	2
III. INNOCAPTION IS THE ONLY EXISTING IP CTS PROVIDER WITH A COMPLETE MOBILE SOLUTION.....	4
IV. RATE REDUCTIONS HAVE RESULTED IN SUBSTANTIAL UNDUE HARDSHIP TO INNOCAPTION DESPITE RAPID EFFICIENCY GAINS AND VARIABLE COST REDUCTION.....	5
V. GRANT OF THE REQUESTED WAIVER IS IN THE PUBLIC INTEREST.....	7
VI. CONCLUSION	10

Accepted / Filed

JUN 14 2019

Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals with)	
Hearing and Speech Disabilities)	
)	
Misuse of Internet Protocol (IP) Captioned)	CG Docket No. 13-24
Telephone Service)	
)	

EMERGENCY PETITION FOR INTERIM WAIVER

Pursuant to sections 1.1, 1.3, and 1.41 of the Federal Communications Commission's (FCC or Commission) rules,¹ MezmorCorp ("InnoCaption") respectfully requests the Commission to issue a waiver of the IP CTS 2019-20 compensation rate adjustment adopted in the *IP CTS Modernization and Reform Order*,² that provides a rate freeze at the current interim rate of \$1.75 per minute for InnoCaption, as an emergent provider, until a permanent rate methodology is implemented in the ongoing rulemaking proceeding.

I. BACKGROUND

In the 2018 *IP CTS Modernization and Reform Order*, the Commission ordered a glide path in the form of two ten percent reductions to the IP CTS compensation rate.³ The first reduction was to a rate of \$1.75 per minute for the 2018-19 fund year, from July 1, 2018 to June 30, 2019. The second reduction was to a rate of \$1.58 per minute for the 2019-20 fund year, from July 1, 2019 to June 30, 2020. To support the reductions to the IP CTS rates, the Commission relied upon a finding

¹ 47 CFR §§ 1.1, 1.3, 1.41. *See also* 47 U.S.C. § 225

² Misuse of Internet Protocol Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing Loss and Speech Disabilities, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 18-79 (June 8, 2018) ("IP CTS Reform Order")

³ IP CTS Reform Order ¶ 26

that providers' actual costs were substantially below the adopted rates under the prevailing MARS rate methodology, resulting in excessive profits being generated by the industry. Accordingly, the Commission believed a reduction of the compensation rate to levels closer to actual average provider costs would reduce excessive profits and drive efficiency amongst IP CTS service providers.⁴

II. SUMMARY

While InnoCaption fully supports the Commission's objective of driving cost efficiencies across the IP CTS industry to ensure the viability of the TRS Fund, we believe it is equally important to ensure that IP CTS reimbursement policies foster competitive innovation and technological advancement that help drive long-term efficiencies in the industry while fulfilling the Commission's mission of providing functionally equivalent telecommunication services for the deaf and hard of hearing community. As the only service provider offering a mobile IP CTS solution across Android and iOS devices, InnoCaption is at the forefront of bringing functional equivalence to users living in an increasingly mobile-centric world. InnoCaption has also provided the Commission with transparent updates regarding our progress in reducing per minute costs, which demonstrate the scalability of our business model and our potential to quickly become a highly cost competitive IP CTS service provider.⁵

Furthermore, in setting the glide path, the Commission made it clear that it had no intention of causing a rate shock for IP CTS providers or disrupting the provision of quality service for consumers.⁶ In fact, the glide path was intended to allow "higher cost providers a reasonable opportunity to adjust [...] by reducing unnecessary expenses".⁷ However, as the newest entrant into the IP CTS market that is still in the earlier stage of growth and scaling, InnoCaption is not in a position to absorb these rate reductions at such a rapid pace due to the need for continued investment in personnel and technology.⁸ The next upcoming rate reduction to \$1.58 per minute would put at

⁴ IP CTS Reform Order ¶ 14

⁵ See Letter from Cristina O. Duarte, Director of Regulatory Affairs, MezmoCorp (dba InnoCaption), to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123 and 13-24 (filed April 30, 2019) ("InnoCaption April Ex Parte Presentation"); See Also Letter from Cristina O. Duarte, Director of Regulatory Affairs, MezmoCorp (dba InnoCaption), to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123 and 13-24 (filed May 6, 2019) ("InnoCaption May Ex Parte Presentation")

⁶ IP CTS Reform Order ¶ 24

⁷ IP CTS Reform Order ¶ 32

⁸ Appendix at 8,9

risk our ability to continue offering a high-quality service to our growing user base and would place undue financial hardship on our business.⁹ This would in turn raise the risk of a market exit by InnoCaption, which would eliminate the only available comprehensive mobile IP CTS service and waste years of investment and R&D that has contributed to bringing this valuable technology to market.

The Commission has discretion to waive a rule where the particular facts make compliance with the rule inconsistent with the public interest,¹⁰ taking into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.¹¹ Waiver of the Commission's rules is appropriate where special circumstances warrant a deviation from the general rule and where such a deviation will serve the public interest.¹² The upcoming industry-wide IP CTS rate reduction to \$1.58 places undue financial hardship on the only provider with a comprehensive mobile service offering and raises the risk of potential market exit in the near term. In addition, the reduction would have the immediate negative impact of inhibiting further development of this valuable mobile accessibility technology.¹³ Therefore, a waiver of the IP-CTS 2019-20 compensation rate adjustment to freeze the current interim rate of \$1.75 per minute for InnoCaption, as an emergent provider, would address the rule's inconsistency in serving the public interest in an individual manner. This waiver would serve the public interest by enabling a unique emergent provider to continue providing its mobile IP CTS service and drive technological advancement in the industry, while on the other hand increasing the cash outlay of the TRS Fund [REDACTED]

[REDACTED] There is even publicly stated support by another IP CTS service provider in favor of granting relief to the smallest provider, as a measure that would be "reasonable, supported by precedent and well founded."¹⁵ Furthermore, precedent exists for such a waiver from the Commission's order on March 1, 2016, whereby it granted relief to smaller video relay service

⁹ Appendix at 9

¹⁰ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

¹¹ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166.

¹² *Northeast Cellular*, 897 F.2d at 1166.

¹³ Appendix at 8,12

¹⁴ [REDACTED]

¹⁵ See Letter from Tamar Finn and Danielle Burt, Counsel to ClearCaptions, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123 and 13-24 (filed March 21, 2019); See Also Letter from Tamar Finn, Counsel to ClearCaptions, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123 and 13-24, at footnote 1 (filed April 25, 2019)

providers against rapid rate reductions in the form of a freeze of compensation rates in order to provide them additional time to “reach the optimum scale to compete effectively.”¹⁶

III. **INNOCAPTION IS THE ONLY EXISTING IP CTS PROVIDER WITH A COMPLETE MOBILE SOLUTION**

InnoCaption’s entry into the IP CTS market has been a catalyst for user migration to mobile captioned services. According to a recent user survey conducted by InnoCaption, we found that [REDACTED] of our surveyed users have experience with captioned landline telephones but are now switching exclusively to mobile phone usage after discovering InnoCaption.¹⁷ Another group of [REDACTED] of our users have in fact never used landline captioned telephones, illustrating the latent demand for mobile IP CTS services that incumbent industry providers focused on landline captioned telephones have failed to address in the past. We expect this shift to mobile IP CTS usage to continue as the industry catches up with broader mobile phone usage trends, especially as older age groups with later stage hearing loss are becoming increasingly comfortable with smartphone usage.¹⁸ Under this backdrop, InnoCaption has been proactively driving technological innovation in the industry and meeting the modern needs of the deaf and hard of hearing community.

InnoCaption believes that user migration towards smartphone app-based IP CTS services will bring with it many advantages from the perspective of user convenience, compliance, and long-term cost efficiency for the industry.¹⁹ From a user perspective, a mobile IP CTS service like InnoCaption provides increased independence through the ability to make personal, work and 911 emergency calls from any location with access to cellular or Wi-Fi data. In addition, IP CTS services delivered on smartphone apps allow for easy switching between different providers, which in turn encourages innovation and high service quality standards through increased competition. From a compliance perspective, because apps are downloaded onto users’ own personal smartphone devices, there is less risk of non-eligible users in a home (e.g. family members or visiting friends) inadvertently using

¹⁶ Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Report and Order, 31 FCC Red at 2343-2345 (March 1, 2016) (“VRS Partial Rate Freeze Order”)

¹⁷ Appendix at 5

¹⁸ See Demographics of Mobile Device Ownership and Adoption in the United States, Mobile Fact Sheet (2019), <https://www.pewinternet.org/fact-sheet/mobile/> (last visited Jun 13, 2019) indicating that 79% of people in the 50-64 age group have a smartphone.

¹⁹ Appendix at 4

captions on calls and incurring waste for the TRS Fund. For example, a registered InnoCaption user opens their activated InnoCaption app in order to make outbound captioned calls on their smartphone device. On the other hand, if a hearing family member were to borrow the user's device, that person would make calls using the normal calling feature which would not be captioned. From a cost efficiency perspective, migration to mobile services should reduce the need to develop, manufacture, install and periodically upgrade landline captioned telephones which should contribute to reducing overall industry costs in the long run.

Furthermore, to support recent announcements by the FCC encouraging the implementation of automated speech recognition ("ASR") technology, InnoCaption has been developing and trialing ASR features within its mobile app.²⁰ InnoCaption's exclusive focus on app-based IP CTS technology allows for rapid technology development and deployment since app updates can regularly be pushed to users directly on their smartphone devices. By trialing ASR technology with our users and soliciting direct call quality feedback and ratings, InnoCaption is able to collect valuable data around the real-world service quality of ASR-generated captions, benchmarked against our highly trained stenographers. In this way, despite being the smallest IP CTS provider today, InnoCaption is pushing the boundaries of technological innovation within the industry.

IV. RATE REDUCTIONS HAVE RESULTED IN SUBSTANTIAL UNDUE HARDSHIP TO INNOCAPTION DESPITE RAPID EFFICIENCY GAINS AND VARIABLE COST REDUCTION

The InnoCaption team set two major financial milestones in developing its business plan. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] This would enable us to be a fully self-funding business, providing stability for our employees, and allow us to continue to reinvest for further technology development and efficiency gains.

[REDACTED]

[REDACTED]

²⁰ IP CTS Reform Order at ¶¶ 49-52

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]²¹ This achievement gave us comfort around the long-term viability of our unique stenographer captioned business model.

Despite rapid efficiency gains and variable cost reductions, our second financial milestone has proven difficult to achieve due to the unexpected IP CTS reimbursement rate cuts that took effect following the Commission's IP CTS Reform Order. In the beginning of 2018, with sudden reimbursement rate cuts in sight and significant uncertainty around future revenues, InnoCaption's management team was forced to make tough decisions to ensure the business stayed afloat. All management and staff were required to extend the below-market salaries they had agreed to during the initial startup phase of the business, and much needed hiring of basic corporate functions were delayed indefinitely. As a result, our organization currently has only [REDACTED] and every member of staff must cover multiple job functions for the business to continue operations.²² Due to these emergency measures taken by the InnoCaption team, the actual costs for 2018 that were recorded in our annual audit report to Rolka Loube do not accurately reflect the fully loaded cost structure that our business requires to be sustainable going forward. We estimate that our fully loaded allowable cost per minute would have stood at [REDACTED] for the 2018 calendar year, based on actual variable costs and a theoretical fixed cost budget using our initially planned 2018 organizational structure, market level salaries for staff, and [REDACTED]. Breaking down the year further, we estimate that by the fourth quarter of 2018, our fully loaded allowable cost would have been reduced to [REDACTED].

[REDACTED]
[REDACTED]
[REDACTED]

The Commission's IP CTS Reform Order and resulting reimbursement rate cuts have placed substantial undue hardship on the InnoCaption team and raises the risk of market exit, which would

²¹ These numbers are based on actual allowable variable costs submitted by InnoCaption to Rolka Loube as part of the Annual Data Request.

²² [REDACTED]

lead to the discontinuation of our unique mobile IP CTS service. IP CTS services are InnoCaption's only source of revenue and therefore our fixed costs and overhead cannot be shared across multiple TRS services or unrelated business lines, unlike many other providers in the industry. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]²³ Our Co-CEO's have committed years of their lives and significant personal resources to bringing this service to the deaf and hard of hearing community. They are committed to operating InnoCaption transparently and in a way that ensures our service contributes to the long-term sustainability of the TRS Fund. However, we are currently unable to sufficiently invest in the business to maintain long-term sustainability and there is a real risk that further rate reductions could lead to InnoCaption's exit from the market.

V. GRANT OF THE REQUESTED WAIVER IS IN THE PUBLIC INTEREST

Today, 81% of Americans have a smartphone and most US households no longer have a landline phone.²⁴ Despite the United States becoming increasingly mobile-centric, the deaf and hard of hearing community has not had the same opportunity to enjoy the full range of freedom that comes with having telecommunications accessibility on a mobile phone. This has forced the community to remain tethered to their landlines and unable to make or receive phone calls beyond the confines of their respective homes or places of work. This also means that the deaf and hard of hearing community does not have the ability to access critical telecommunications services during emergency situations away from their landline phones.

Since gaining FCC certification in 2014, InnoCaption has brought innovation to the IP CTS industry across both caption delivery medium and methodology. InnoCaption is the only provider of a comprehensive mobile IP CTS solution across Android and iOS devices.²⁵ In addition, InnoCaption

²³ Please note that to avoid any conflicts or compliance risks, none of the service minutes generated by our Co-CEO user on the InnoCaption platform are submitted for reimbursement from the Telecommunication Relay Services (TRS) fund.

²⁴ See Demographics of Mobile Device Ownership and Adoption in the United States, Mobile Fact Sheet (2019), <https://www.pewinternet.org/fact-sheet/mobile/> (last visited Jun 13, 2019); See Also Blumberg SJ, Luke JV. Wireless substitution: Early release of estimates from the National Health Interview Survey, January-June 2018. National Center for Health Statistics. (Rel. Dec 2018) <https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201812.pdf> (last visited Jun 13, 2019)

²⁵ Appendix at 3

is the only IP CTS provider that utilizes highly trained stenographers to produce live captions for phone calls. These features allow InnoCaption to provide a seamless mobile phone experience to its deaf and hard of hearing users.

InnoCaption now provides its service to [REDACTED] registered users who use our technology for everyday tasks that hearing users take for granted on their mobile devices, such as communicating with family and friends, participating in phone interviews, and joining conference calls with colleagues and clients.²⁶ We have heard numerous compelling anecdotes of users being able to speak to a family member on the phone for the first time and users successfully re-entering the workforce thanks to the unprecedented telecommunications accessibility offering that InnoCaption provides to them. In fact, [REDACTED] of InnoCaption's registered users are working age individuals between the ages of 30 to 69.²⁷ The ability to access mobile telecommunications is critical in the modern world, whether it is to be effective at work, to stay connected with family or to have access to emergency communication services. Therefore, it is imperative for the deaf and hard of hearing community to have the opportunity to use mobile devices for voice communications and InnoCaption is leading the IP CTS industry in accomplishing this mission.

Despite our success in bringing a unique mobile IP CTS solution to market, the recent reimbursement rate cuts have made it extremely difficult for us to grow our team to accommodate our growing user base. Currently, each of our staff members are critical to our business, yet incredibly stretched in terms of responsibilities. [REDACTED]

If InnoCaption is unable to make additional hires in the near term, our users will likely begin to feel the immediate impact of a company that is severely understaffed in the form of reduced customer support quality. As previously presented to the Commission, [REDACTED]

[REDACTED] has a wide range of responsibilities including assistance with account registration, app installation, mobile phone setting configuration, and ongoing troubleshooting. By granting this waiver, the Commission would provide InnoCaption with the near-term revenue stability required to invest in additional staff to maintain a highly responsive customer

²⁶ Appendix at 2,6

²⁷ Appendix at 5

support function. This is especially important for new and existing InnoCaption users, such as senior citizens, who may have less experience with smartphone devices.

While a degradation in customer support quality would be the initial effects felt by our user community, the inability to further invest in our engineering team could also have a detrimental effect on the availability of InnoCaption's unique mobile service offering. InnoCaption is currently supported by [REDACTED] who are responsible for ensuring the InnoCaption app continues to meet all mandatory technical standards while constantly upgrading and adding new user features.²⁸ Maintaining the operational status of our service on a 24/7 basis requires significant attention and our engineering team is stretched thin, covering a wide range of responsibilities including back-end database and infrastructure management, compliance related technical development, and end-user app interface updates. Furthermore, our engineers must constantly test and update the InnoCaption app following any updates to Android or iOS operating systems, which occur frequently and with little notice. Any inability or delay in making the necessary updates to the InnoCaption app could lead to service disruption for users. Further investment in the engineering team is required for InnoCaption to be able to offer a stable mobile IP CTS solution.

Both the inability to receive timely customer support and the potential for reduced service availability could ultimately lead to individuals not having access to a functionally equivalent telecommunications solution. Therefore, by granting this waiver, the Commission would be serving the public interest by enabling InnoCaption to expand the team to properly service our growing user base and by providing a path to building a sustainable business. This would ultimately be in the best interest of the deaf and hard of hearing community because service interruptions, or a worst-case scenario of InnoCaption's exit from the market, would leave the community without an equivalent mobile service offering. Currently no other providers offer an IP CTS solution for Android, the largest mobile operating system by number of users. In addition, other service providers may not be able to offer a replacement solution in the market for some time given the engineering challenges involved. This could effectively push the deaf and hard of hearing community back to sole reliance on landline phones, depriving them of functionally equivalent access to modern mobile communication devices.

28 [REDACTED]

VI. CONCLUSION

For the reasons stated herein, we respectfully request the Commission grant this Emergency Petition for Interim Waiver that freezes the IP CTS reimbursement rate at the current interim rate of \$1.75 per minute for InnoCaption, as an emergent provider, as it would be in the public interest and in furtherance of the policy goals the Commission sought to promote in adopting the IP-CTS Modernization and Reform Order.

Respectfully Submitted,

Cristina O. Duarte
Director of Regulatory Affairs
MezmoCorp (dba InnoCaption)
14111 Robert Paris Court
Chantilly, VA 20151
(571) 210-7687
cristinaduarte@innocaption.com

June 14, 2019



InnoCaption

EMERGENCY PETITION FOR INTERIM WAIVER

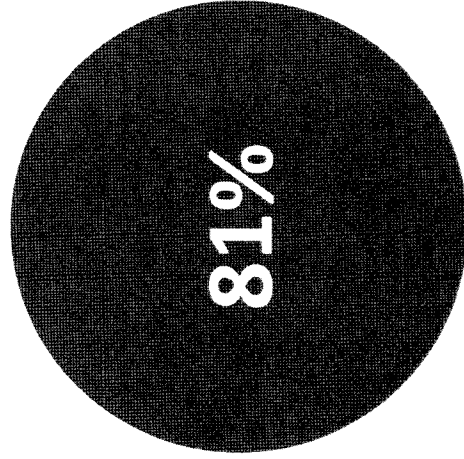
APPENDIX

InnoCaption's Purpose

an increasingly mobile-centric world, InnoCaption provides the deaf and hard of hearing community with the only complete mobile app-based IP-CTS communication solution

With increasing smartphone penetration, most US households no longer have a landline phone

Examples of situations where our users need mobile voice communications



- Receive a client call for work
- Make an outbound call to a colleague
- Participate in phone interviews
- Call doctor's office
- Dial 911 emergency
- Receive call from child's school
- Book or confirm restaurant reservation
- Call family and friends on the go




Demographics of Mobile Device Ownership and Adoption in the United States, Mobile Fact Sheet (2019), <https://www.pewinternet.org/fact-sheet/mobile/> (last visited Jun 13, 2019)
Lumberg SJ, Luke JV. Wireless substitution: Early release of estimates from the National Health Interview Survey, January-June 2018. National Center for Health Statistics. (Rel. Dec 2018)
<https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201812.pdf> (last visited Jun 13, 2019)

REDACTED - FOR PUBLIC INSPECTION



Living Innovation




noCaption has been at the forefront of innovation within the IP-CTS industry with its mobile communication offering, a service that other providers have been slow to bring to market

optioned call service offering for each IP-CTS provider



Fully supports Android and iOS devices

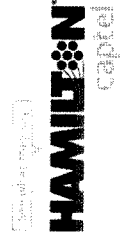





Limited



Only on WiFi connected iPads (cellular data incompatible)









Limited






Legacy Android app only (no support for new devices)

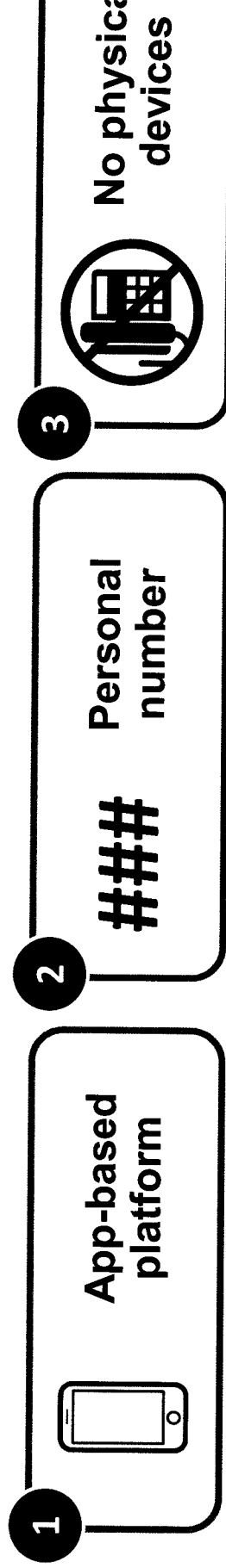
iOS app only recently launched in March 2019

Unique Advantages

noCaption's unique focus on its mobile-only communication service provides benefits for users, reduces compliance risks, and contributes to the long-term sustainability of the TRS Fund



ers



liance



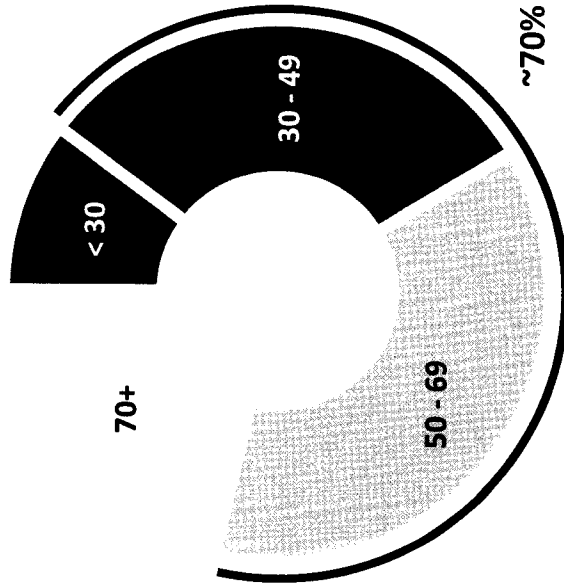
ding

REDACTED - FOR PUBLIC INSPECTION

Our User Profile

InnoCaption is a powerful enabler for a largely working age, technologically savvy user base.

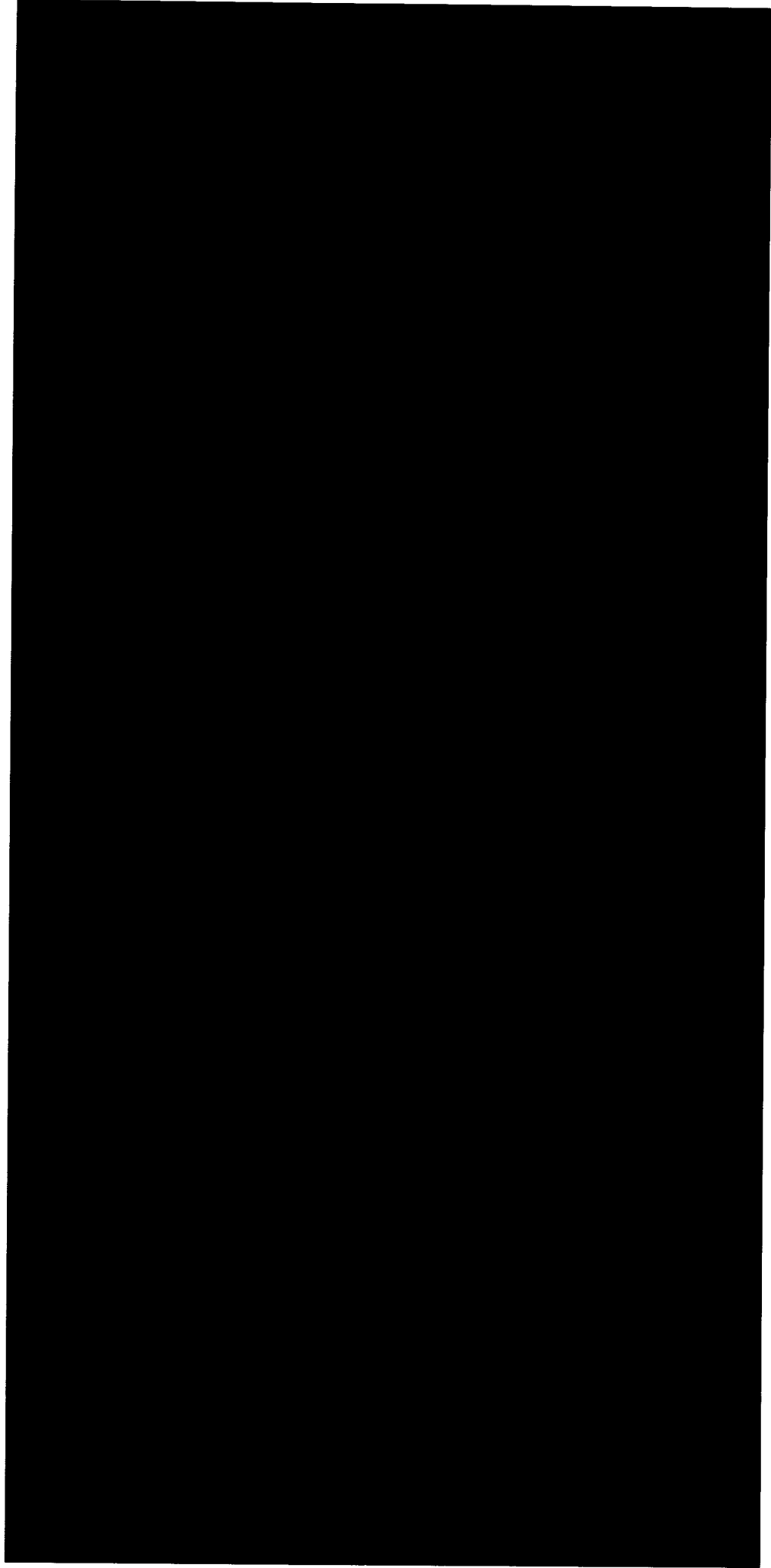
Users by Age Group



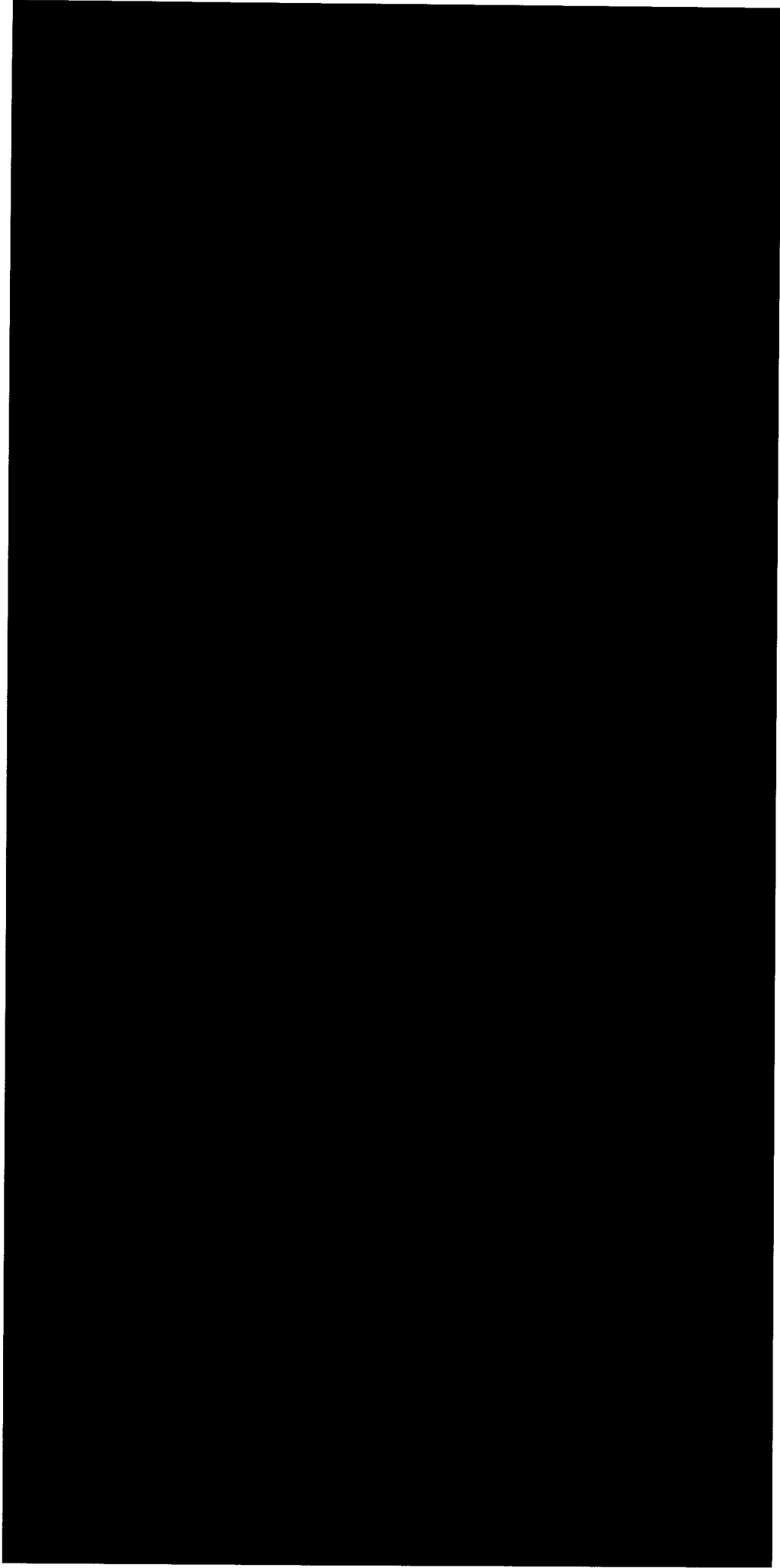
REDACTED - FOR PUBLIC INSPECTION

Source: Company user data as of December 2018; InnoCaption User Survey completed in December 2018

Who are InnoCaption users?



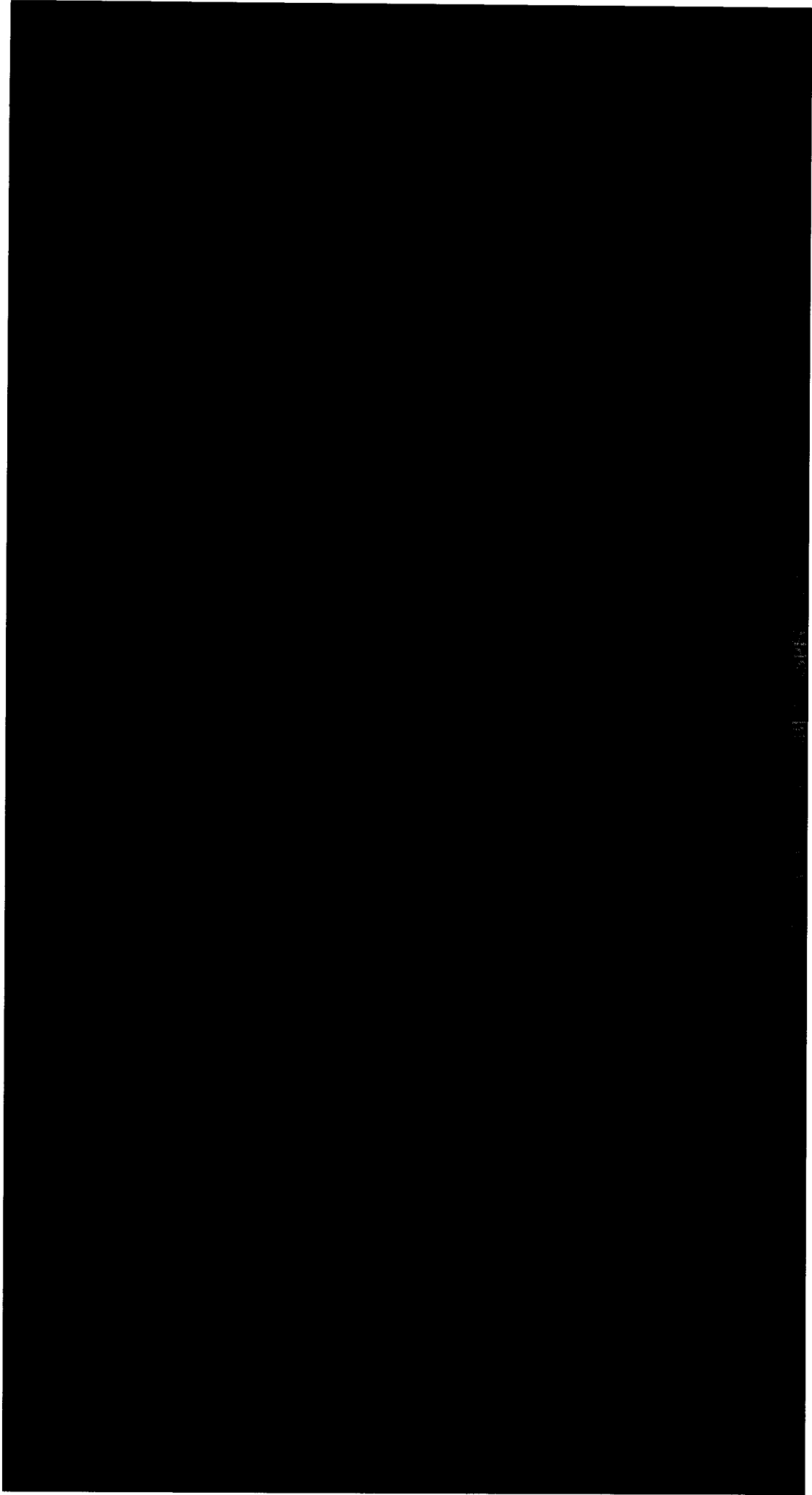
raction to Date



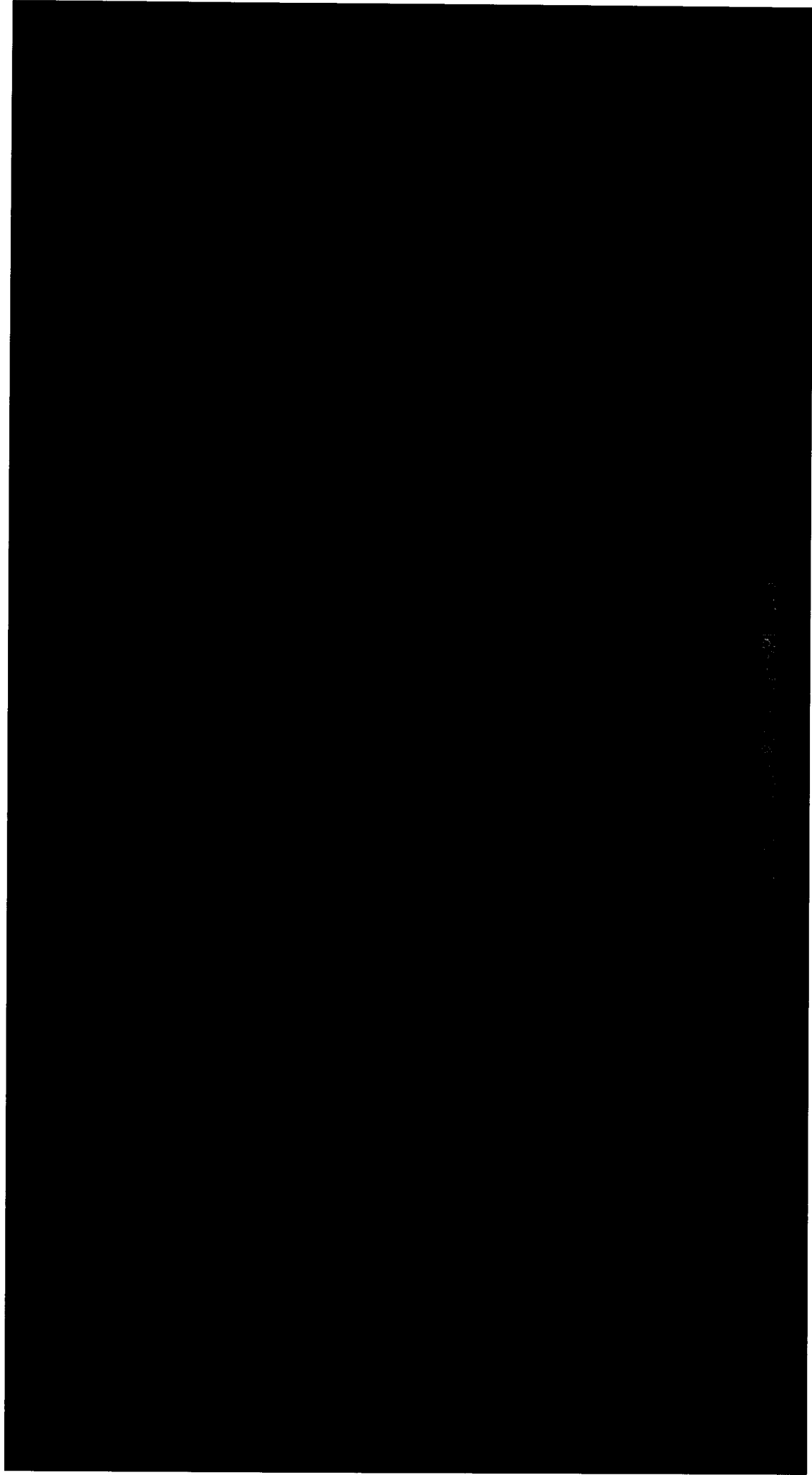
REDACTED - FOR PUBLIC INSPECTION

re: Company data as of February 2019; InnoCaption User Survey completed in December 2018

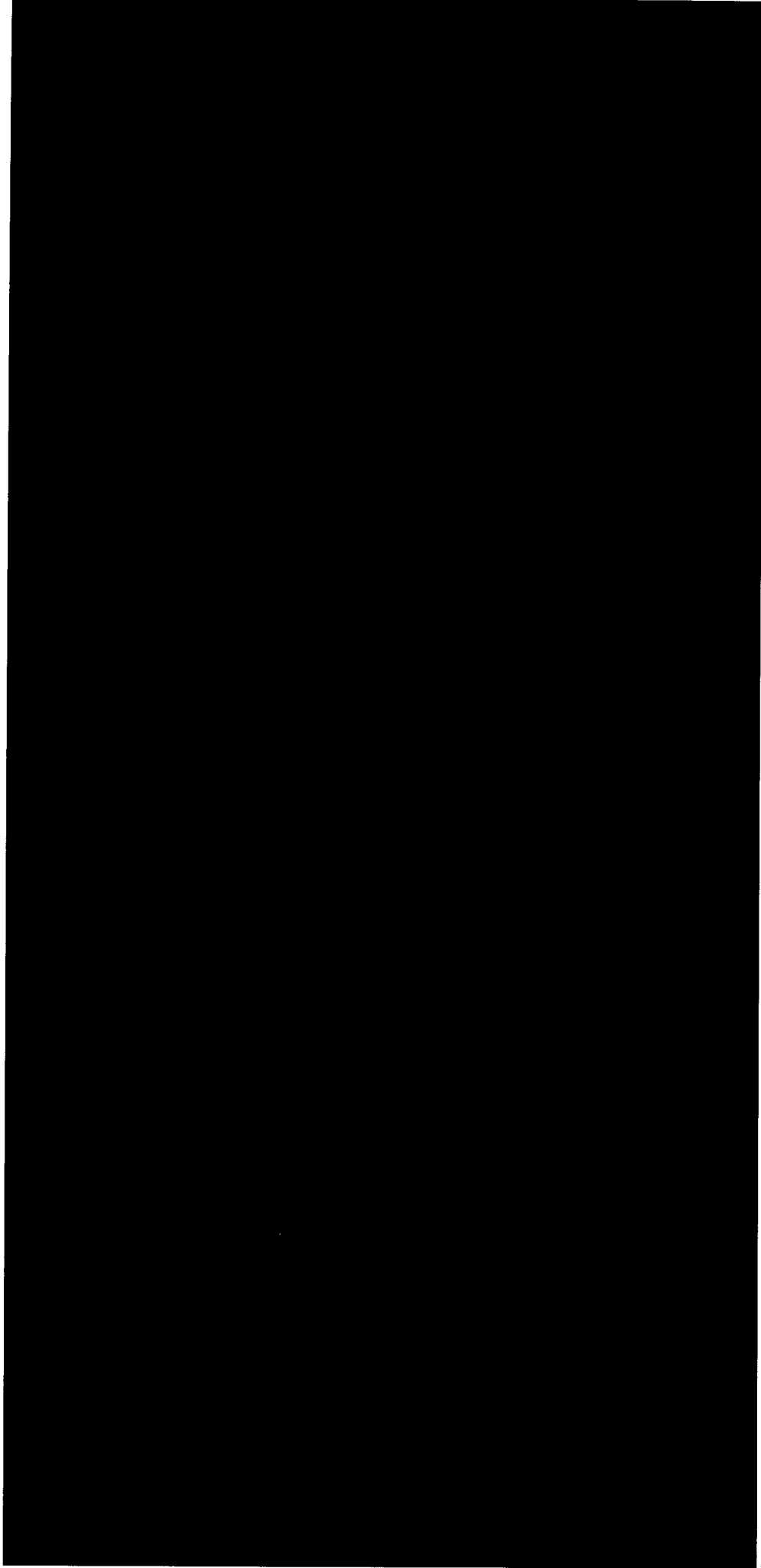
Immediate Investment Need



Impact of IP-CTS Rate Cuts



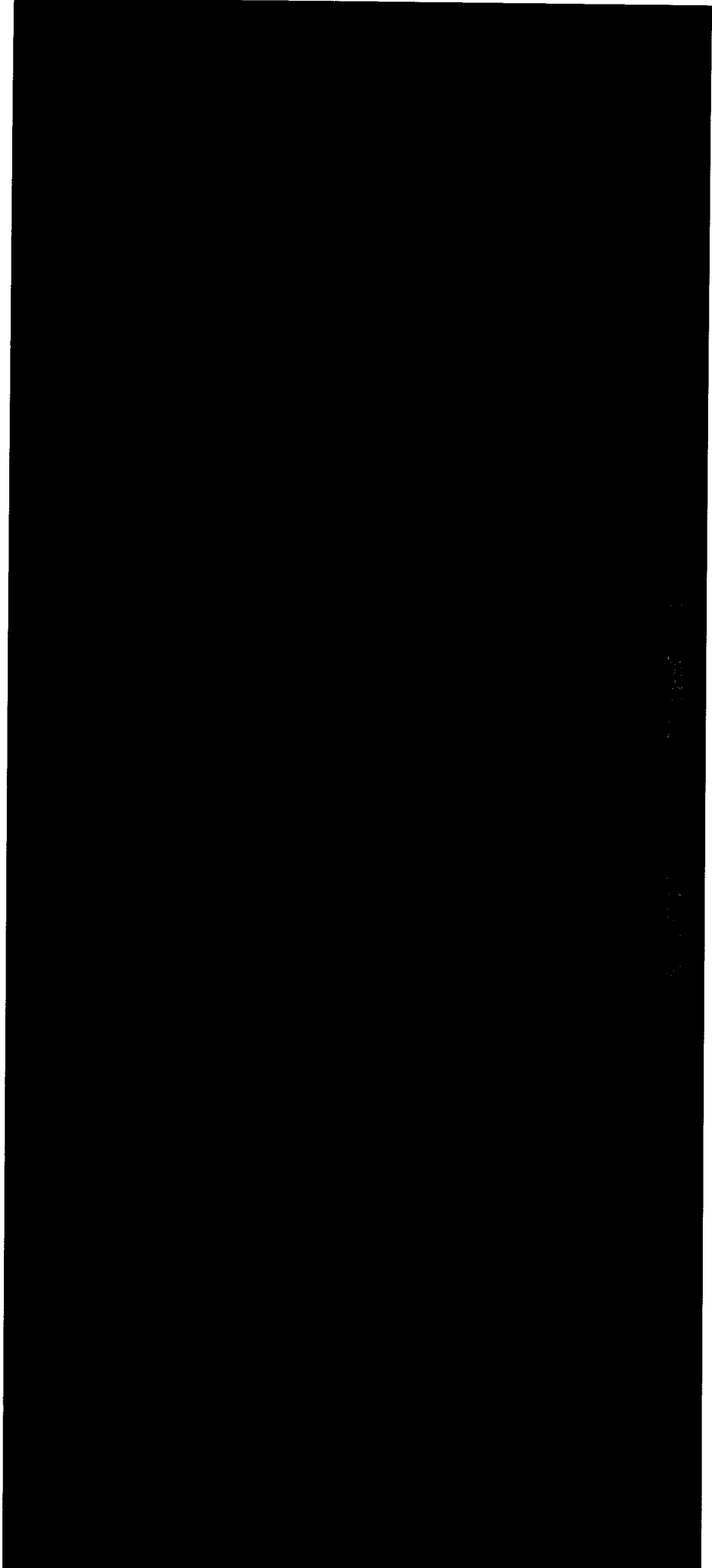
request for Emergency Rate Freeze



REDACTED - FOR PUBLIC INSPECTION

SR Development Update

noCaption is once again leading the industry with the development and testing of ASR technology.  



SR Deployment Plan

[REDACTED] We will use our learnings from the test to implement features that will accelerate user adoption

[REDACTED]

REDACTED - FOR PUBLIC INSPECTION

onclusion

InnoCaption is a leader in the IP-CTS industry with regards to mobile technology and offers users a unique and modern accessibility solution

[REDACTED]

[REDACTED]

[REDACTED]